

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

v.

AHSHA NATEEF TRIBBLE [1]
DONALD KEITH ELLISON [2]

CRIMINAL NO. 19-541-FAB-2

MOTION TO RESTRICT

TO THE HONORABLE COURT:

COMES NOW defendant, by its undersigned counsel and hereby requests, states and prays as follows:

1. Pursuant to this Honorable Court's Standing Order #9, effective on February 1, 2013 all parties who wish to restrict the viewing by other parties of a Motion need to concurrently file with the motion a motion to restrict stating the reasons that support the sealed or selected parties filing.

2. In compliance with the cited Order leave is hereby requested to file a restricted Motion.

3. The reason for the present request is that the filed motion contains matters regarding defendant's rights which must be protected and also Grand Jury materials. In order to protect the due process and Sixth Amendment rights of defendant and grand jury secrecy the motion cannot be filed in a public docket.

4. The rights of defendant in this criminal prosecution outweigh the presumption of public access to information.

WHEREFORE, it is very respectfully requested from this Honorable Court to GRANT leave to file the requested Motion Ex-Parte.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, this April 15, 2021.

CERTIFICATE OF SERVICE: I hereby certify that on April 15, 2021, I electronically filed the foregoing motion with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties.

Dated: April 15, 2021

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